Document Electronically Filed

David R. King, Esq. dking@herrick.com Leah Kelman, Esq. lkelman@herrick.com HERRICK, FEINSTEIN LLP One Gateway Center Newark, New Jersey 07102 Telephone: (973) 274-2000

Facsimile: (973) 274-2500

Richard S. Mandel, Esq. (pro hac vice application to be filed)

rsm@cll.com

Jonathan Z. King, Esq. (pro hac vice application to be filed)

jsk@cll.com

COWAN, LIEBOWITZ & LATMAN, P.C.

114 West 47th Street

New York, New York 10036 Telephone: (212) 790-9200

Facsimile: (212) 575-0671

Attorneys for Plaintiffs Promotion In Motion, Inc. and Welch Foods Inc., A Cooperative

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

PROMOTION IN MOTION, INC. and WELCH FOODS INC., A COOPERATIVE

20-CV

v.

KERVAN USA LLC,

RULE 7.1 DISCLOSURE STATEMENT OF PLAINTIFFS PROMOTION IN MOTION, INC. AND WELCH FOODS INC., A **COOPERATIVE**

Defendant.

Plaintiffs,

Pursuant to Federal Rule of Civil Procedure 7.1, Plaintiff Promotion In Motion, Inc. ("PIM") certifies that it does not have any parent corporation. Further, there are no publicly held corporations that own 10% or more of PIM's stock.

Pursuant to Federal Rule of Civil Procedure 7.1, Plaintiff Welch Foods Inc., A Cooperative ("Welch's") certifies that its parent corporation is National Grape Co-Operative Association, Inc., a New York corporation. Further, there are no publicly held corporations that own 10% or more of Welch's or its parent corporation National Grape Co-Operative Association, Inc.'s stock.

Dated: December 24, 2020 HERRICK, FEINSTEIN LLP

By: /s/ David R. King
David R. King
dking@herrick.com
One Gateway Center
Newark, New Jersey 07102
Telephone: (973) 274-2000
Facsimile: (973) 274-2500

Richard S. Mandel, Esq. (pro hac vice application to be filed) rsm@cll.com
Jonathan Z. King, Esq. (pro hac vice application to be filed) jsk@cll.com
COWAN, LIEBOWITZ & LATMAN, P.C.
114 West 47th Street
New York, New York 10036
Telephone: (212) 790-9200
Facsimile: (212) 575-0671

Attorneys for Plaintiffs
Promotion In Motion, Inc. and
Welch Foods Inc., A Cooperative